

REMARKS

Claims 14, 15, 17, 18, 20-26, and 30-37 are pending in this application. Claims 31-35 are withdrawn from consideration.

Claim Objections

The Examiner objects to **claims 14, 18, 21, 23 and 36** because of informalities. Applicants have made appropriate correction.

Rejection Under 35 U.S.C. § 101 of Claims 14, 15, 17, 18, 20-26, 30, and 36-37

The Examiner rejects **claims 14, 15, 17, 18, 20-26, 30, and 36-37** under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter.

Claim 14

The Examiner rejects **claim 14** because the claimed invention is directed to non-statutory subject matter. The Examiner's analysis is mistaken because it is clear from the claim as a whole that the method is carried out by inserting data into an electronic document on a computer system. First, the preamble provides the antecedent basis for the term "first electronic document." That antecedent basis clearly involves use of a machine. It says, ") A method of extending a definition of a first tag used in a first electronic document ... stored on a server in a computer network." One of ordinary skill in the art would find this clear. Second, the providing element requires putting references into the first electronic document. The references point to ("for locating") the first schema and the second schema. One of ordinary skill in the art understands that schemas for processing electronic documents are electronic data structures. This is confirmed by dependent claim 15. As claim 14 is heavily laden with reference to use of electronic documents stored in a computer network and the method steps include manipulating the electronic documents to include functional references to electronic schemas that are used to interpret the electronic documents.

Therefore, claim 14 should not be rejected under § 101.

Claims 15, 17, 18, 20-24, 36 and 37

The Examiner rejects **claims 15, 17, 18, 20-24, 36 and 37** because the claimed invention is directed to non-statutory subject matter. However, the Examiner did not consider or discuss the wording of the dependent claims and ignored the additional limitations in these claims. (OA at 5) Failing to consider the limitations of the dependent claims is error, because the Examiner is obligated to consider the claims as a whole when applying Section 101. *Diamond v. Diehr*, 450 U.S. 175, 188-89, 209 USPQ 1, 9 (1981); MPEP § MPEP §§ 2106 (II) at 2100-8 (Rev. 6 Sept. 2006) (quoting *Diamond v. Diehr*). The error is prejudicial because there are limitations in the dependent claims that make it clear that the method is electronically implemented. For instance, the additional limitation of claim 15 is “parsing the first electronic document, wherein the first electronic document is parsed by a parser for the markup language, the parser being stored on the server.” A parser stored and running on a computer is specified by this claim language, which obviates any Section 101 rejection. We need not discuss each dependent claim separately, because the Examiner failed to make out a *prima facie* case, and that is a sufficient basis for withdrawing the rejection. Because the Examiner erred in failing to consider or discuss in the office action the limitations of the dependent claims, thereby failing to make out a *prima facie* case, and the error was prejudicial, the rejection should be withdrawn.

Therefore, claims 15, 17, 18, 20-24, 36 and 37 should not be rejected under § 101.

Claim 25

The Examiner rejects **claim 25** because the claimed invention is directed to non-statutory subject matter. Claim 25 describes a computer network system for processing a document instance of a markup language. This computer system comprises the following elements: a means for defining a first schema in the computer network system; a means for extending a definition of an element in the first schema by use of a second schema residing on the computer network system; and a means for importing the second schema into the document instance. Each of the elements of claim 25 is in

means-plus-function form, the means including data structures in memory of a computer network system form processing a document instance. The structures corresponding to means for defining a first schema include an enhanced schema language, described on pp. 13 et seq. of the specification. See, FIG. 2. The structures corresponding to means for extending a definition of an element include the “extends statement” illustrated in the example on pp. 14-15. See, FIG. 2, ref 204. The structures corresponding to means for importing the second schema into the document instance include URNs, URIs and URLs directly or indirectly specified in an XML document, as illustrated on pp. 22-25. See, FIG. 2, ref 212, 214. Alternatively, the means include a processor responsive to data structures specifying definitions, extensions and imports.

The Examiner erred in addressing compliance of claim 25 with Section 101 when she failed to identify the structures in the specification that correspond to the claimed means. The Court of Appeals for the Federal Circuit, in its en banc decision *In re Donaldson Co.*, 16 F.3d 1189, 29 USPQ2d 1845 (Fed. Cir. 1994), decided that a “means-plus-function” limitation should be interpreted in a manner different than patent examining practice had previously dictated.

Per our holding, the “broadest reasonable interpretation” that an examiner may give means-plus-function language is that statutorily mandated in paragraph six. Accordingly, the PTO may not disregard the structure disclosed in the specification corresponding to such language when rendering a patentability determination.

See, MPEP § 2181 at 2100-233 *et seq.* The Examiner did not follow *In re Donaldson*, either in the Section 101 analysis (OA at 5) or the anticipation analysis. (OA at 8-10) The Examiner’s error was prejudicial, because the structures that correspond to the means clauses include data structures in memory of a computer network system that functionally control processing of a document instance. These functional data structures in memory clearly satisfy Section 101.

Therefore, claim 25 should not be rejected under § 101.

Claims 26 and 30

The Examiner rejects **claims 26 and 30** because the claimed invention is directed to non-statutory subject matter. However, the Examiner did not consider or discuss the wording of the dependent claims and ignored the additional limitations in

these claims. (OA at 5) Failing to consider the limitations of the dependent claims is an error, because the Examiner is obligated to consider the claims as a whole when applying Section 101. *Diamond v. Diehr*, 450 U.S. 175, 188-89, 209 USPQ 1, 9 (1981); MPEP § MPEP §§ 2106 (II) at 2100-8 (Rev. 6 Sept. 2006) (quoting *Diamond v. Diehr*). The error is prejudicial because there are limitations in the dependent claims that make it clear that the method is electronically implemented. For instance, the additional limitation of claim 30 is “means for using an extension of the first tag, wherein the extension of the first tag is used in a location reserved for the first tag in the document instance.” This limitation includes a “location” in computer memory, which obviates any Section 101 rejection. Because the Examiner erred in failing to consider or discuss in the office action the limitations of the dependent claims, thereby failing to make out a *prima facie* case, and the error was prejudicial, the rejection should be withdrawn.

Therefore, claims 26 and 30 should not be rejected under § 101.

Applicants respectfully submit that the rejection of claims 14, 15, 17, 18, 20-26, 30, and 36-37 under § 101 should be withdrawn.

Double Patenting Rejection

The Examiner rejects claims 14, 15, 17, 18, 20-26, 30, and 36-37 under obviousness-type double patenting as being unpatentable over claims 34-38 of U.S. Patent No. 6,591,260.

Preliminarily, the Examiner again failed to consider the structural limitations of claims 25, 26 and 30. It was an error to not follow *In re Donaldson*, and this error was prejudicial because the words of the ‘260 patent claims do not suggest the structures that correspond to the means clauses.

The Examiner’s analysis does not address the limitations of the claims, much less the limitations of the dependent claims. Analyzing claims for so-called obviousness-type double patenting, non-anticipation of a dependent claim may save the independent claim from the double patenting rejection; so it clearly is not enough to assert double patenting against the independent claim and assume that the dependent claims consequentially fall.

The Examiner's analysis does not establish a *prima facie* case of obviousness-type double patenting, because it does not quite follow the procedure required by law to analyze the issue. This is an arcane area of law, so we looked for a good explanation and demonstration of how to perform the required analysis. One illustrative case is attached.

It is unfortunate that the doctrine is called "obviousness-type" double patenting, because the name tends to mislead examiners into following their typical section 103 type analysis. A crucial difference is that the analysis compares one previously issued claim to one pending claim. MPEP § 804 (II)(B)(1) at 800-21 (Rev. 5 Aug. 2006). Neither references nor claims are combined for comparison to the pending claim: the analysis is one issued claim to one pending claim. Art references have limited use, not to be combined with the reference, but to show what is an obvious variation on or qualitative equivalent to the issued claim. This obvious variation analysis is more like determining inherency for anticipation or to section 112(6) analysis of structural equivalents than it is like section 103 obviousness. The obviousness-type double patenting rejection is a much narrower ground for rejection than section 103 obviousness.

We attach the illustrative case of *Engineered Prods. v. Donaldson Co.*, 225 F.Supp.2d 1069 (N.D. Iowa 2002) *aff'd in part, rev'd in part, vacated in part and remanded*, 147 Fed.Appx 979 (Fed. Cir. Aug. 31, 2005). This case is not controlling precedent, as the Federal Circuit rejected the double patenting defense on different grounds than the District Court and did not authorize publication of its opinion. Nonetheless, the District Court's published opinion is instructive because the judge discussed thoughtfully most of the cases cited in the MPEP plus a few others and followed conscientiously the specified analysis for obviousness-type double patenting. He addressed several issues about which the MPEP is silent.

Where the MPEP § 804 requires the Examiner to "make clear ... [t]he differences between the inventions defined by the conflicting claims – a claim in the patent compared to a patent in the claimed invention", the judge in *Engineered Prods* did this with a side-by-side comparison. *Id.*, 225 F.Supp.2d at 1094-1100.

The judge in *Engineered Prods* rejected using prior art references (or other patents) in combination with the base claim. *Id.*, at 1120-23. He explained the role of multiple references for obviousness-type double patenting analysis in these words:

the court's consideration of the import of the "prior art" in *In re Longi* "start[ed] by examining the claims of the [earlier] patent, and by assessing the prior art references in order to ascertain whether the PTO made out a *prima facie case of obviousness*" of the application claims *in light of the earlier patent and the prior art*. *Id.* at 895-96. *Consequently, the "prior art" was considered in the context of obviousness-type double patenting to determine whether it was a sort of bridge or connection between the **claims** of the earlier patent and the **claims** of the application, for one of ordinary skill in the art, to see if it demonstrated that the later application was **only an "obvious variation"** of the claims of the earlier patent.* See *Eli Lilly*, 251 F.3d at 969 (obviousness-type double patenting determines whether "[any] difference renders the claims patentably distinct"); *In re Goodman*, 11 F.3d at 1052 (because the claimed inventions were not identical in scope, the court was required to determine, at the second step of the analysis, whether the differences defined only an "obvious variation" or a "patentable distinction"). To put it another way, the prior art was used to determine whether the earlier and later patents "obviously" claimed the same thing. In the context of obviousness-type double patenting, the "prior art" was *not* considered as rendering the application claims "obvious" without regard to the earlier patent that purportedly established obviousness-type double patenting. *In re Longi*, 759 F.2d at 895-96 (emphasizing, instead, that "a double patenting rejection presupposes a[n] [earlier] patent"). Moreover, it appears that, in *In re Longi*, what the prior art "taught" was drawn primarily from what was *claimed* in the prior art patents, not just the structures present in embodiments of the invention. *Id.* at 896.

Id., at 1122 (*italics and bold facing* in opinion). The judge found the defendant's analysis lacking for any attempt to demonstrate how the prior art would provide a bridge from the claims of the earlier patent to the later claims, by demonstrating, for a person of ordinary skill in the art, that the later claims are only an "obvious variation" of, or "obviously" claiming essentially the same thing, as the earlier patent. *Id.* at 1123.

The judge struggled with a "composite invention" approach to the claims of the issued patent and pending application. *Id.* at 1113-14. At length, he held that any "patently distinct dependent claim would save from invalidation not only itself, but also the independent claim from which the patently distinct dependent claim depends, even if the independent claim ... is not patentably distinct by itself." *Id.* at 1115.

It is clear that the motivation to combine test has no application to obviousness-type double patenting analysis (*id.* at 1121-23), because an obviousness-type double patenting rejection cannot be based on combining claims from two different patents.

With the correct legal standard in mind, which cannot be found in the MPEP or without reading some court cases, it becomes clear that the Examiner erred and did not quite take all of the steps needed to establish a *prima facie* case. First, the Examiner did not address the dependent claims. Following the judge's reasoning in *Engineered Prods*, non-anticipation of the dependent claims saves the independent claim from double-patenting rejection. Second, the Examiner's entire analysis "The claim limitations appear to have been reworded, however, the scope of the invention appears to be generally the same." Clearly, this analysis is not enough to justify an anticipation or obviousness rejection. Similarly, it is not enough to justify a double-patenting rejection.

Claim 14 is not anticipated by the '260 patent claim 34 because the language of claim 34 does not include, "wherein the second tag is polymorphically used to encode text within the first electronic document, whereby the first and second schemas respectively allow use of the first or second tag", which appears in claim 14. The Examiner has given no specific reason why a person of ordinary skill in the art would consider this limitation of claim 14 to be inherent in the language of claim 34.

The rejection should be withdrawn because the Examiner failed to follow the procedure required to support an obviousness-type double patenting rejection and because the Examiner's error is demonstrably prejudicial.

Rejection Under 35 U.S.C. § 102(e) of Claims 14, 15, 17, 18 20-26, 30, and 36-37

The Examiner rejects **claims 14, 15, 17, 18, 20-26, 30, and 36-37** under 35 U.S.C. § 102(e) as anticipated by Meltzer, U.S. 6,125,391.

Claim 25

Claim 25 includes the limitations:

means for defining a first tag, including a plurality of elements from a markup language, in a first schema in the computer network system;

means for polymorphically extending a definition of the first tag by use of a second schema residing on the computer network system, the second schema defining a second tag by reference to the first tag that incorporates in the second schema the plurality of elements from the markup language and by including additional elements;

means for importing the second schema into the document instance.

These limitations are not found in Meltzer.

Repeating in part, for ease of reference, the description given above, claim 25 describes a computer network system for processing a document instance of a markup language. Each of the elements of claim 25 is in means-plus-function form. **The structures corresponding to means for extending a definition of an element include the “extends statement” illustrated in the example on pp. 14-15. See, FIG. 2, ref 204.** Alternatively, the means include a processor responsive to data structures specifying definitions, extensions and imports.

It would be surprising if the ‘391 patent to Meltzer, with a common assignee to this application, anticipated claim 25. In fact, it does not.

It is black letter law, recited in MPEP § 2131, at 2100-67 (Rev. 6, Sept. 2007), that, “A claim is anticipated only if **each and every element as set forth in the claim** is found, either expressly or inherently described, in a single prior art reference.” Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). “The **identical invention** must be shown in **as complete detail** as is contained in the ... claim.” Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). **The elements must be arranged as required by the claim.** In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990). Accordingly, we need only show one element arranged differently in the MPEG reference than in the claim.

The Examiner’s response to the polymorphic means element does not satisfy the exacting test for anticipation. The Examiner quotes from Meltzer ‘391 that,

The service DTD schema may be extended with a service type element in a common business language repository ... The service description referred to by the market participant DTD defines the documents that the service accepts and generates upon competition of the service. A basic service description is specified below as a XML document transact.dtd ... such as an invoice, or a description of an exchange of value. This document type

supports many uses, so the transaction description element has an attribute that allows user to distinguish among invoices, performance, offers to sell, requests for quotes and so on.

The Examiner makes no attempt (OA at 8-9) to read this passage from Meltzer '391 on the structures corresponding to means for polymorphically extending a definition of an element, particularly the "extends statement" illustrated in the example on pp. 14-15.

See, FIG. 2, ref 204. This passage is not close to reading on an extends statement. The extends statement extends an individual data element and makes the old and new elements interchangeable, avoiding the problem of breaking existing implementations.

The reference's !ATTLIST statement lists services that a marketplace supports. One is at a data element/data structure level, the other at a service/marketplace level.

Therefore, there is no anticipation.

To illustrate graphically, here are the competing examples of structures:

This Application	Meltzer '391
<pre><schema uri = "ContactAddress.sox"> <namespace prefix = "CBL" uri = "CBL.sox"/> <elementtype name = "Contact"> <extends prefix = "CBL" type = "Address"> <append> <element type = "PhoneNumber" occurs = "*" /> </append> </extend> </elementtype> </schema></pre>	<pre><!ELEMENT service.type EMPTY> <!ATTLIST service.type service.type.name (catalog.operator commercial.directory.operator eft.services.provider escrower fulfillment.service insurer manufacturer market.operator order.originator ordering.service personal.services.provider retailer retail.aggregator schema.resolution.service shipment.acceptor shipper van</pre>

It is readily apparent that the structure of the extends statement is not anticipated by the !ATTLIST structure. The !ATTLIST structure is not close enough to the extends statement to meet the exacting standard of anticipation.

Moreover, Meltzer '391 is not available for use as a Section 103(a) reference, due to Section 103(c)(1), because the inventors, including overlapping inventor Matthew Fuchs, were, at the time the invention was made, obligated to assign their

inventions to the same entity, which was Veo merged into Commerce One. “[F]or applications pending on or after November 10, 2004, a commonly assigned/owned patent or application may be disqualified as 35 U.S.C. 102(e) prior art in a 35 U.S.C. 103(a) rejection. See 35 U.S.C. 103(c)(1).” MPEP § 804, at 800-29 (Rev. 5, Aug. 2006); accord, MPEP § 706.02(i)(1)(I), at 700-55 (Rev. 6, Sept. 2007). Therefore, Meltzer not only does not anticipate claim 25, it is not available as a basis for a non-obviousness rejection.

Therefore, claim 25 should be allowable over Meltzer.

Claim 26

Claim 26 should be allowable over Meltzer for at least the same reasons as claim 25, from which it depends.

Claim 30

Claim 30 includes the limitations:

means for using an extension of the first tag, wherein the extension of the first tag is used in a location reserved for the first tag in the document instance.

These limitations are not anticipated by Meltzer.

The Examiner’s data structure does not anticipate the claimed means because we claim a data element tag appearing at a reserved location in a document and the Examiner counters by pointing to two different services offered in the same marketplace, which are listed in the same !ATTLIST. The services are not polymorphically interchangeable data elements in a data structure; they are different services within a marketplace. Therefore, there is no anticipation.

Therefore, claim 30 should be allowable over Meltzer.

Claim 14

Claim 14 includes the limitations:

defining the first tag in a first schema, wherein the definition of the first tag includes a plurality of elements from the markup language;

defining a second tag in a second schema, wherein a definition of the second tag includes

a reference to the first tag that identifies the first tag as being extended;
and

an additional element from the markup language;

providing references for locating the first schema and second schema in the first electronic document, wherein the second tag is polymorphically used to encode text within the first electronic document, whereby the first and second schemas respectively allow use of the first or second tag.

These limitations are not found in Meltzer.

The Examiner's proposed combination of column 4 (OA at 11), which describes a BID document, and column 19 (OA at 8-9), which describes a list of services provided by a marketplace, violates the rule that requires, for an anticipation rejection, finding all of the elements in a single reference and that "**[t]he elements must be arranged as required by the claim.** In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990)." MPEP § 2131. There is no connection in Meltzer '391 between the BID of column 4 and the !ATTLIST of column 19. Therefore, there is no anticipation.

Moreover, the Examiner's incorporation by reference of arguments regarding claim 25 does not read on "the second tag ... polymorphically used to encode text within the first electronic document, whereby the first and second schemas respectively allow use of the first or second tag" in the first electronic document. The !ATTLIST structure in column 19, on which the Examiner relies, is a single schema. There are not two schemas used that alternatively allow use of a first or second tag in the same first electronic document. Therefore, there is no anticipation.

There are a variety of Commerce One assigned applications that use variations on the term "polymorphic" (e.g., 11/343,039 filed 30 January 2006, which continues 09/730,489 filed 5 December 2000, which is Pat. No. 6,993,506; 09/493,954 filed 28 January 2000, which is Pat. No. 6,591,260 (on which the Examiner has relied for the double patenting rejection). However, Meltzer '391 does not use the term "polymorphic" or any variant of the term. The claims conspicuously use the term "polymorphically" to avoid confusion about what "extends" means, which plagued prior office actions. The Examiner has erred by failing to give patentable weight to the term "polymorphically" and has ignored the fact that Melter '391 does

not use this term or describe a structure of equivalent function. The error is prejudicial, because it has led to an unfounded rejection.

For the two reasons given and the additional reasons explained above in the context of claim 25, to the extent that they apply to a method claim, Applicants respectfully urge that claim 14 should be allowable over Meltzer.

Claims 15 & 17

Claims 15 and 17 should be allowable over Meltzer for at least the same reasons as claim 14, from which they depend.

Claims 20-24

Claims 20-24 should be allowable over Meltzer for at least the same reasons as claim 14, from which they depend.

Claim 36

Claim 36 includes the limitations:

defining the first tag in a first schema;

defining a second tag in a second schema, wherein a definition of the second tag includes a reference to the first tag and an additional tag from the markup language;

providing references for locating the first schema and second schema in the first electronic document, wherein the first and second tags are polymorphically available to encode text within the first electronic document;

whereby an application designed to work with the first tag can process the text encoded using the second tag, when the encoding is within the scope of the first tag, without modifying the application, whereby document types and applications can evolve separately.

These limitations are not found in Meltzer.

This claim make explicit the natural consequence of the providing polymorphic first and second tags, "whereby an application designed to work with the first tag can process the text encoded using the second tag ... without modifying the application, whereby document types and applications can evolve separately".

The Examiner erred in relying on a section of Meltzer that does not express this natural consequence:

The rejection of claim 25 above is incorporated herein in full. Additionally, Meltzer teaches wherein an application designed to work with the first tag can process the text encoded using the second tag, when the encoding is within the scope of the first tag, without modifying the application, whereby document types and applications can evolve separately [*See Col. 10, line 29 – Col. 12, line 4: an XML document type definition DTD, although other document definition architectures could be used, and includes interpretation information for the logical structures used in interpretation of instances of the documents ... participant nodes in the network establish virtual enterprises by interconnecting business systems and services with XML encoded documents that businesses accept and generate.*].

Interpretation information and virtual enterprises do not inherently or expressly include polymorphic use of first and second tags in a manner that allows document types and applications to evolve separately.

The Examiner further erred because the proposed combination of column 10 (OA at 14), which describes use of a service BID document to define a transaction interface, and column 19 (OA at 8-9), which describes a list of services provided by a marketplace, violates the rule that requires, for an anticipation rejection, finding all of the elements in a single reference and that “[t]he elements must be arranged as required by the claim. In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).” MPEP § 2131. There is connection in Meltzer ‘391 between the BID of column 4 and the !ATTLIST of column 19 is definition of a service that appears among a list of services. This does not read on the natural consequence expressed in claim 36. Therefore, there is no anticipation.

For the two reasons given and the additional reasons explained above in the context of claim 25, to the extent that they apply to a method claim, Applicants respectfully urge that claim 36 should be allowable over Meltzer.

Claim 37

Claim 37 includes the limitations:

wherein the first and second schemas reside on separate servers.

These limitations are not found in Meltzer.

The Examiner's argument regarding this claim is too unclear to make out a *prima facie* case. Figure 2 illustrates nested logical structures of a BID interface definition (ref. 200), as explained in columns 9-10. So the first schema presumably is the schema for an interface definition (ref. 200). The second schema to which the Examiner refers, for a market participant, appears in columns 11-12, below line 20. The top level title, encoded <H1> for this schema is "Market Participant Sample BID". This appears to correspond to FIG. 2 references 201-203, as the "Service Description Sample BID" in Meltzer begins one third of the way down columns 15-16, where the "Market Participant Sample BID" ends. The relationship between Figure 2 and the "markpart.dtd", on which the Examiner relies is the latter is an example of part of what Figure 2 illustrates.

When the material on which the Examiner relies is understood, there is no basis for arguing that Meltzer Figure 2 illustrates two polymorphically related schemas stored on separate servers.

Therefore, claim 37 should be allowable over Meltzer.

Applicants respectfully submit that claims 14, 15, 17, 18 20-26, 30, and 36-37 should be allowable over Meltzer.

CONCLUSION

Applicants respectfully submit that the pending claims are now in condition for allowance and thereby solicit acceptance of the claims as now stated.

Applicants would welcome an interview, if the Examiner is so inclined. The undersigned can ordinarily be reached at his office at (650) 712-0340 from 8:30 a.m. to 5:30 p.m. PST, Monday through Friday, and can be reached at his cell phone at (415) 902-6112 most other times.

Fee Authorization. The Commissioner is hereby authorized to charge underpayment of any additional fees or credit any overpayment associated with this communication to Deposit Account No. 50-0869 (OIN 1012-1).

Respectfully submitted,

Dated: September 22, 2008

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